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Counsel for the Copyright Claimants

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

NOTICE OF COPYRIGHT CLAIMANTS' MOTION TO WITHDRAW REFERENCE

PLEASE TAKE NOTICE that upon the accompanying (i) Memorandum of Law in Support of the Copyright Claimants' Motion to the Withdraw the Reference, and (ii) the Declaration of Matthew J. Oppenheim in Support of the Copyright Claimants' Motion to Withdraw the Reference and all exhibits thereto, UMG Recordings, Inc., Capitol Records, LLC, and ABKCO Music & Records, Inc. (collectively, the "Universal Claimants"); Sony Music Entertainment, Arista Music, Arista Records LLC, LaFace Records LLC, Sony Music Entertainment US Latin, Volcano Entertainment III, L.L.C., and Zomba Recording LLC

¹ The last four digits of Debtor Frontier Communications Corporation's tax identification number are 9596. Due to the large number of debtor entities in these chapter 11 cases, for which the Court has ordered joint administration, a complete list of the debtor entities and the last four digits of their federal tax identification numbers are not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at https://cases.primeclerk.com/ftr. The location of the Debtors' service address for purposes of these chapter 11 cases is: 50 Main Street, Suite 1000, White Plains, New York 10606.

(collectively, the "Sony Claimants"); and Atlantic Recording Corporation, Atlantic Records Group LLC, Bad Boy Records LLC, Big Beat Records Inc., Elektra Entertainment Group Inc., Fueled by Ramen LLC, Lava Records LLC, Maverick Recording Company, Nonesuch Records Inc., Rhino Entertainment Company, Rhino Entertainment LLC, Roadrunner Records, Inc., Warner Music Inc., Warner Music International Services Limited, Warner Music Nashville LLC, and Warner Records Inc. (collectively, the "Warner Claimants," and together with the Universal Claimants and the Sony Claimants, the "Copyright Claimants"), by and through undersigned counsel, will move the United States District Court for the Southern District of New York at a date and time to be determined for entry of an Order (i) pursuant to 28 U.S.C. § 157(d), Federal Rule of Bankruptcy Procedure 5011, and Local Bankruptcy Rule 5011-1, withdrawing the reference with respect to the all pre- and post-petition claims filed by the Copyright Claimants and (ii) granting such other and further relief as the Court deems just and proper.

Dated: White Plains, New York June 9, 2021 LUSKIN, STERN & EISLER LLP

By: /s/ Michael Luskin
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